Holland+Knight

Tel 202 955 3000 Fax 202 955 5564 Holland & Knight LLP 2099 Pennsylvania Avenue, N.W., Suite 100 Washington, D.C. 20006 www.hklaw.com

June 17, 2005

George Y. Wheeler 202 457 7073 George.wheeler@hklaw.com

Via ECFS Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth Street, SW, TW-A325 Washington, DC 20054

Re:

Ex Parte Presentation WT Docket No 02-353

Dear Ms. Dortch:

On June 17, 2005 Joseph R. Hanley, and I on behalf of United States Cellular Corporation spoke with Blaise Scinto, Peter Corea and Jennifer Tomchin in the Commission's Wireless Telecommunications Bureau regarding possible revisions to the channelization and service area selections for the 1.7/2.1 GHz Advanced Wireless Services (AWS) band plan in the above reference proceeding.

U.S. Cellular is on the record in support of the T-Mobile/RTG Joint Proposal to revise the band plan originally adopted for AWS. Our support of the Joint Proposal is based on several key principles. First, we strongly support adoption of a revised band plan which includes at least 50 MHz of MSA/RSA and EA licensed spectrum. Spectrum licensed on this basis is useable by all carriers, but it is the only spectrum realistically accessible to regional and smaller carriers. Second, as a regional provider, we support opportunities for possible aggregation of adjacent EA and MSA/RSA spectrum blocks as well as aggregation of multiple adjacent EA spectrum blocks. Unlike the proposal recently put forward by Verizon, the Joint Proposal and other channel plans would preserve opportunities for spectrum aggregation not only for the very largest carriers, but for regional operators as well.

We urge the Commission to adopt the Joint proposal or to consider alternate band plans that support similar objectives, namely to make sufficient spectrum available in accessible license sizes and to provide flexibility to carriers of all sizes who seek to aggregate spectrum. An example of an alternative to the Joint Proposal that would meet these goals is the following:

1710	1720	1725	1730	1735	1740	1745	1755
MSA/RSA	į Ε Α.	EA,	4	REAG	REAG	REAG	
2110	2120	2125	2130	2135	2140	2145	2155

In this alternative, the Commission would increase the MSA/RSA block to 20 MHz, as proposed and supported by T-Mobile, RTG, Verizon and numerous others. Second, the expanded MSA/RSA block would be positioned next to the EA spectrum. Third the EA spectrum would be located in the band plan as three adjacent 10 MHz blocks. As the "middle-sized" areas, EAs are key building blocks. Creating a "seventh" block in this manner not only promotes flexibility in the aggregation of EA blocks with each other or with MSA/RSAs but also offers opportunities for the aggregation of EA spectrum with REAG block sizes.

Pursuant to section 1.1206(b)(2) of the Commission's rules, and electronic copy of the letter is being filed for inclusion in the above-reference docket. Please direct any questions regarding this filing to the undersigned. For your convenience we also attach a table showing the Commission's original AWS band plan, the T-Mobile/RTG band plan and the alternative band plan described above.

SincereR

George V. Wheeler

Cc via e-mail:

Peter Corea (<u>Peter.Corea@fcc.gov</u>)
Blaise Scinto (<u>Blaise.Scinto@fcc.gov</u>)
Jennifer Tomchin (<u>Jennifer.TomchinA@fcc.gov</u>)

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Variations on AWS Band Plan

Band Plan from AWS Order - 10/03

1710	1720	1730	1735	1740	1755
EA.	REAG	REAG	MSA/RSA	REAC	3
2110	2120	2130	2135	2140	2155

T-Mobile/RTG Proposal – 3/11/2005

(endorsed by USCC at 4/29/05 meeting)

1710	1720	1730	1735	1745	1750	1755
EA.	REAG	REAG	MSA/RSA	≱ . FEA	REAG	
2110	2120	2130	2135	2145	2150	2155

Additional Example Cited in Letter - 06/05

1710		1720	1725	1730	1735	1740	1745	1755
MSA/RS	SA .	EA .	EA.	≆EA	REAG	REAG	REAG	
2110		2120	2125	2130	2135	2140	2145	